

REMARKS

The Examiner has rejected claims 1-5, 7 and 12 under 35 U.S.C. § 102(e) as being anticipated by Sieber et al. U.S. Patent Application Publication No. 2005/0176230. Claims 6, 8-11 and 13 are rejected under § 103(a) as being unpatentable over Sieber et al. in view of Bhanap et al. U.S. Patent Application Publication No. 2005/0085840. Claims 14-26 are rejected under § 103(a) as being unpatentable over Sieber et al. in view of Bhanap et al.

Applicants respectfully traverse. All claims recite "treating the exposed surface [of the fluoro-carbon dielectric film] with a supercritical carbon dioxide fluid." Sieber et al. do not teach or suggest this treatment step. Sieber et al. disclose treating the surface of an ITO/glass substrate with a supercritical carbon dioxide fluid. An ITO/glass substrate is not a fluoro-carbon dielectric film. After the treatment, the treated ITO/glass substrate is baked and dried. Thereafter, a fluoro-carbon dielectric film is deposited on the dry, treated ITO/glass substrate. Thus, Sieber et al. do not treat the fluoro-carbon film with supercritical fluid to remove contaminants therefrom, but rather, treat a substrate to clean it for subsequent deposition of a fluoro-carbon film onto the clean substrate.

Examiner has merely picked parts of the disclosure of Sieber et al. and pieced them together in an attempt to support the rejections under §§ 102 and 103 without regard to their context. Sieber et al., when read as a whole and in context, simply does not teach each and every element of the claimed method. It is firmly established that it is not permissible to pick and choose only so much of any given reference as will support a given position and ignore the

reference in its totality. The context of the disclosure must be considered. Examiner has simply found that Sieber et al. disclose treating "something" with supercritical fluid and that Sieber et al. disclose a fluoro-carbon film, and then concludes that the "something" being treated is the fluoro-carbon film. A careful review of the reference, however, will reveal that Examiner's conclusion is completely unfounded, and based upon picking and choosing parts of the reference, stripping the parts of their context, and then putting them together in a manner that bears no resemblance to the actual disclosure of the reference to attempt to defeat patentability. This cannot stand. Applicants thus respectfully request withdrawal of all rejections of claims 1-26 over Sieber et al., alone or in combination with Bhanap et al.

Further, with respect to the combination of Sieber with Bhanap et al., Examiner alleges that Bhanap et al. disclose a silicon containing chemical and a nitrated fluorocarbon film, as claimed in claims 6, 8-11, 17, 19, 21, 23 and 24. The relevant claims refer to a silicon-containing chemical solvent that is used with the supercritical carbon dioxide to clean contaminants and provide surface termination. The relevant claims also refer to the fluoro-carbon film as being nitrated. Bhanap et al. disclose a silicon-containing chemical that is used in spin-on-coating of a substrate to form a silica dielectric film. Thus, Bhanap et al. are disclosing a precursor for depositing silica, not a solvent for cleaning and surface termination. Thus, one skilled in the art would have no motivation based on Sieber et al. and Bhanap et al. to use the silicon-containing chemicals disclosed in Bhanap et al. as a solvent with the supercritical fluid disclosed by Sieber et al. Bhanap et al. also disclose a nitrated hydrocarbon solvent, which bears

no relation to a nitrated fluoro-carbon dielectric film, as claimed. Again, the disclosures of the reference are taken completely out of context, which is not permissible, and cannot form the basis of an obviousness rejection. For at least these additional reasons, Applicants respectfully request withdrawal of the rejections of claims 6, 8-11, 13, 17, 19, 21, 23 and 24.

With respect to claims 12 and 25, Examiner alleges that Sieber et al. disclose depositing a metal-containing film onto the treated surface of the fluorocarbon film, referring to Fig. 3 and references 32 and 34. References 32 and 34 are plasma-producing electrodes. The substrate is placed onto electrode 32 and electrode 34 is above and spaced from the substrate. The electrodes produce a plasma in the gap between the substrate and electrode 34 to plasma-treat the substrate or deposit fluorocarbon material onto the substrate. There is absolutely no disclosure of depositing a metal film over the fluorocarbon layer. For at least these additional reasons, Applicants respectfully request withdrawal of the rejections of claims 12 and 25.

With respect to claims 13 and 26, Examiner alleges that Sieber et al. disclose, at page 3, para. 0035, that the metal-containing film is tantalum. That portion of the disclosure is referring to the electrodes that are formed on the glass substrate. The fluorocarbon film is then deposited over the electrodes. Thus, there is no disclosure of depositing tantalum onto the treated surface of a fluorocarbon film. Again, the Examiners characterization of the disclosure of Sieber et al. is completely taken out of context and is inconsistent with what the reference is actually disclosing. For at least these additional reasons, Applicants respectfully request withdrawal of the rejections of claims 13 and 26.

Application No. 10/711,649
Response dated June 7, 2006
to Office Action mailed March 7, 2006

Applicant submitted an Information Disclosure Statement on April 7, 2006, after the mailing of the Office Action. In the next Action, Applicant request consideration of the references cited therein, as well as consideration of the amendments submitted herein.

In view of the foregoing amendments to the claims and remarks given herein, Applicants respectfully believe this case is in condition for allowance and respectfully request allowance of the pending claims. If the Examiner believes any detailed language of the claims requires further discussion, the Examiner is respectfully asked to telephone the undersigned attorney so that the matter may be promptly resolved. The Examiner's prompt attention to this matter is appreciated.

Applicants are of the opinion that no additional fee is due as a result of this amendment. If any charges or credits are necessary to complete this communication, please apply them to Deposit Account No. 23-3000.

Respectfully submitted,

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